UNITED STATES DISTRICT COURT WESTERN DISTRICT OF LOUISIANA LAKE CHARLES DIVISION

DOUGLAS SONNIER,

Case No. 2:20-CV-00002-JDC-KK

v.

JURY TRIAL DEMANDED

RECON MANAGEMENT SERVICES, INC

RULE 41 STIPULATION OF DISMISSAL WITH PREJUDICE

Pursuant to Rule 41(a)(1)(A)(ii), the Parties stipulate to the dismissal of this case with prejudice. Plaintiff, Douglas Sonnier, and all Opt-in Plaintiffs, including but not limited to, Lloyd Higginbotham, Scott Sandifer, Warren Bailey, Sterling Gill, Lance Hawkins, Carrie Johnson, Clarice Neitzel, Merwyn Wright, Nick Cuccio, Jr., Daniel Smith, Glenn Campbell, and Michael Abshire, are dismissing their claims with prejudice. Further, Defendant, ReCon Management Services, Inc., and ReCon Engineering, Inc., is dismissing any claims against Plaintiff or the Opt-in Plaintiffs that could have been asserted in this matter. The Parties further stipulate that both parties are to bear their own fees and costs. A proposed order is attached.

Respectfully submitted,

By: /s/ Richard M. Schreiber
Michael A. Josephson
Texas Bar No. 24014780
Andrew W. Dunlap
Texas Bar No. 24078444
Richard M. Schreiber
Texas Bar No. 24056278

Josephson Dunlap LLP

11 Greenway Plaza, Suite 3050 Houston, Texas 77005 713-352-1100 – Telephone 713-352-3300 – Facsimile mjosephson@mybackwages.com adunlap@mybackwages.com rschrieber@mybackwages.com

AND

Richard J. (Rex) Burch Texas Bar No. 24001807 **Bruckner Burch PLLC** 11 Greenway Plaza, Suite 3025 Houston, Texas 77046 713-877-8788 – Telephone 713-877-8065 – Facsimile rburch@brucknerburch.com

AND

/s/ Kenneth W. DeJean
Kenneth W. DeJean
Louisiana Bar Roll No. 4817
Law Offices of Kenneth W. DeJean
417 W. University Avenue
P.O. Box 4325
Lafayette, La. 70502
337-235-5294 – Telephone
337-235-1095 – Facsimile
kwdejean@kwdejean.com

Attorneys for Plaintiffs

By: /s/ Brian M. Bradford
SCOTT J. SCOFIELD (#14429)
BRIAN M. BRADFORD (#33738)
Scofield, Gerard, Pohorelsky,
Gallaugher & Landry
901 Lakeshore Drive, Suite 900
Lake Charles LA 70601
Telephone: 337-433-9436

Attorneys for Defendant

Facsimile: 337-436-5205

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served by ECF electronic filing on all known parties on this the 22^{nd} day of February 2022.

/s/ Richard M. Schreiber
Richard M. Schreiber